

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF MISSOURI  
SOUTHERN DIVISION

MONICA DANIEL HUTCHISON, )  
)  
Plaintiff, )  
)  
vs. ) Case No. 09-3018-CV-S-RED  
)  
TEXAS COUNTY, MISSOURI; MICHAEL )  
R. ANDERSON, TEXAS COUNTY )  
PROSECUTING ATTORNEY; and )  
MICHAEL R. ANDERSON, )  
Individually, )  
) June 29, 2010  
Defendants. ) Houston, Missouri

VIDEOTAPED DEPOSITION OF BRAD EIDSON

a Witness, produced, sworn and examined on the 29th day of June, 2010, between the hours of 8 a.m. and 5 p.m. of that day, 112 East Main Street, City of Houston, County of Texas, before

JOANN RENEE RICHARDSON, CCR  
Certified Court Reporter  
20051 State Route B  
St. James, Missouri 65559

in the above-entitled cause, pursuant to Notice to Take Video Deposition, on the part of the Plaintiff.

Joann Renee Richardson

\* 573-699-4110 \* St. James, Miss

1 Q. Okay. That's good. And he did not indicate  
2 to you, up to that time, any concern with her sex  
3 life or partners; is that correct?

4 A. I don't recall him saying anything.

5 Q. Okay. And would this have been within a  
6 week of December 18th? Do you have any idea?

7 A. I do not recall.

8 Q. Okay. Now, after that conversation that you  
9 had with Mr. Anderson, which led to you going and  
10 asking Mr. Warlow for the tape that night, has Mr.  
11 Anderson indicated to you since then any  
12 dissatisfaction with Monica Daniel Hutchison as an  
13 employee?

14 A. I don't recall one, no.

15 Q. Okay. Now, you talked about gossip for a  
16 second, I think, in talking about -- and I may have  
17 this wrong -- in regard to one of their two  
18 questions. Now, after the lawsuit was filed, which  
19 is Exhibit 4, and you've talked about gossip, was it  
20 gossip about Monica Daniel Hutchison or Millie  
21 Williams or both that you had heard?

22 MR. FRANKLIN: I'm going to object to  
23 foundation because I'm not sure which type of gossip  
24 we're talking about.

25 MR. STEELMAN: Well, see that's the  
Joann Renee Richardson

\* 573-699-4110 \* St. James, Missouri \*

1 community?

2 A. Having affairs with married men, to me,  
3 would be detrimental.

4 Q. Anything else that you -- gossip, because  
5 you said you heard some gossip with regards to doing  
6 favors for friends in the criminal justice system; do  
7 you recall that?

8 A. Yes.

9 Q. And, again, was that gossip that you heard  
10 with regard to Monica Daniel Hutchison -- and you  
11 said you couldn't tell whether it was to one or both  
12 of them; is that right?

13 A. That's correct.

14 Q. Okay. Was that -- would you say that  
15 gossip, then, was harmful to Monica Daniel  
16 Hutchison's and Mildred Williams' reputations in the  
17 community?

18 MR. HARRIS: I object. I think it  
19 lacks foundation. I think you can ask him about with  
20 regard to him, but I don't think he can testify for  
21 the entirety of Texas County or Houston or Licking or  
22 wherever it is.

23 BY MR. STEELMAN:

24 A. The response to your question, if she was  
25 doing favors for her friends which would involve  
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1 reason for these questions. I think the word gossip  
2 was Mr. Eidson's word.

3 MR. FRANKLIN: I'm more specific as to  
4 the subject matter of the gossip, because as I  
5 understand his testimony, there's gossip on several  
6 different subject matters.

7 MR. STEELMAN: Okay. That's fair. We  
8 need to ask that, too.

9 BY MR. STEELMAN:

10 Q. But on this question right now, I'm just  
11 asking, was the gossip that you have testified to  
12 pertaining to Monica Daniel Hutchison or to Mildred  
13 Williams or to both of them?

14 A. To both.

15 Q. Okay. And was that gossip that you have  
16 heard or that you recall flattering to Monica Daniel  
17 Hutchison or Mildred Williams, or was it negative  
18 with regards to their character?

19 A. I don't think it was a reference to their  
20 character. My recollection is, it was a reference to  
21 their acts. And, you know, I guess anyone could  
22 characterize that however you wanted.

23 Q. Okay. That's fair. Is the gossip that you  
24 heard with regard to Monica Daniel, would that, in  
25 your opinion, be harmful to her reputation in the

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1 removing or not filing the reports or statements of  
2 witnesses, then, yes, I would think that would hurt  
3 her reputation. It would with me.

4 Q. And Mildred Williams; correct?

5 A. Yes.

6 Q. Okay. Now, did you hear any other gossip  
7 after the filing of the lawsuit, which is Exhibit 4,  
8 that was negative or harmful to your way of thinking  
9 with regards to Monica Daniel or Mildred Williams?

10 A. I would have heard gossip and most of that  
11 would have been at or about the time. You  
12 understand, it was four years ago.

13 Q. Okay. Of the filing of the lawsuit?

14 A. Yes.

15 Q. I'm sorry, I just wanted to clear that up.

16 A. I assume that was four years ago. In '06  
17 sometime.

18 Q. Okay. So is it fair to say that the filing  
19 of the lawsuit got people talking?

20 A. I think that would be fair.

21 Q. And it wasn't people talking favorably about  
22 Monica Daniel or Mildred Williams; is that correct?

23 A. I wouldn't say favorably or unfavorably.  
24 To my recollection, just about the fact the lawsuit  
25 had been filed, almost like a joke. So I don't know

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